



LAWSON & WEITZEN

December 15, 2022

RICHARD B. WEITZEN*
PAMELA B. BANKERT, PC*
IRA H. ZALEZNIK
VALERIE L. PAWSON
GEORGE F. HAILER, PC*
KENNETH B. GOULD
GEORGE E. CHRISTODOULOU, PC
DAVID A. RICH*
PATRICIA L. FARNSWORTH
K. SCOTT GRIGGS ***
KENNETH B. SKELLY***
GLENN P. FRANK*
J. MARK DICKISON **
SCOTT P. LOPEZ
JEFFREY P. ALLEN
DARLY G. DAVID
MARIA GALVAGNA MESINGER
JONATHAN P. ASH
JOSHUA M. D. SEGAL*
LAUREN J. WEITZEN
JOHN R. BAUER
RYAN A. CIPORKIN
DONALD J. GENTILE*
PETER A. GRUPP
MICHAEL S. RABIEH
KARA THORVALDSEN **

MICHAEL WILLIAMS
KRISTINA A. ENGBERG
BRENDAN P. SLEAN
CHRISTOPHER A. MCALPIN
BRIANNA L. PATON
JOEL A. WETMORE
ZACHARY B. LUCZYK
ZACHARY R. GODIN
NICOLE M. DAVIES
RACHEL E. MEDARA

* ALSO ADMITTED IN NY
** ALSO ADMITTED IN NH
*** ONLY ADMITTED IN PA
* ALSO ADMITTED IN DC
** ALSO ADMITTED IN NH, RI
*** ALSO ADMITTED IN RI, CT, NH
**** ALSO ADMITTED IN RI

VIA FIRST CLASS MAIL AND EMAIL

Zachary Ian Holzberg, Esq.
Derek Smith Law Group, PLLC
One Penn Plaza, Suite 4905
New York, New York 10119
zachary@dereksmithlaw.com

Michael V. Gervasi, Esq.
Marina Tricorico, Esq.
Scamardella, Gervasi & Kasengrande, P.C.
1010 Forest Avenue
Staten Island, New York 10310
mgervasi@statenlaw.net
mtricorico@statenlaw.net

Re: Kelly Andrade v. Cultural Care, Inc. et al.; United States District Court for the Eastern District of New York; Case No.: 1:21-cv-05237

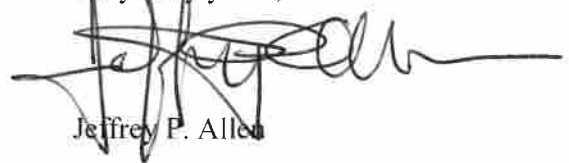
Dear Counsel,

As you know, the undersigned represents Defendant Cultural Care, Inc. in the above-captioned case. In accordance with Fed. R. Civ. P. 56 and Local Civil Rule 56.1, please find enclosed copies of the following documents:

1. Defendant Cultural Care's Notice of Motion for Summary Judgment;
2. Defendant Cultural Care's Memorandum of Law in Support of Motion for Summary Judgment;
3. Defendant Cultural Care's Statement of Undisputed Material Facts; and
4. Defendant Cultural Care's Exhibits 1 – 11 in Support of Motion for Summary Judgment.

In accordance with Judge Kuntz's Individual Motion Practices and Rule III.G.1., Defendant Cultural Care, Inc. has elected to file the motion papers when the motion has been fully briefed as a courtesy to the Court. Please serve us with your Opposition, if any, in accordance with the Court ordered briefing schedule. Please feel free to contact me at (617) 439-4990 should you have any questions.

Very truly yours,


Jeffrey P. Allen

Enclosures.